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CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

ALL ACTIONS

CASE NO. 3:07-CV-5944 SC

MDL NO. 1917

**DECLARATION OF FU-CHIA
“MORGAN” TAI IN SUPPORT OF
DEFENDANTS’ ADMINISTRATIVE
MOTION TO FILE CONFIDENTIAL
DOCUMENTS UNDER SEAL**

I, Fu-Chia “Morgan” Tai, hereby declare as follows:

1. I am currently employed by Chunghwa Picture Tubes, Ltd. (“Chunghwa”), as Senior Director for Chunghwa’s Visual Display Business Unit Sales and Marketing Division. I have personal knowledge of the matters stated herein and if called to do so, I could and would competently testify to the facts stated below. This declaration is submitted in support of Defendants Panasonic Corporation of North America, Panasonic Corporation, and MT Picture Display Co., Ltd.’s (“Panasonic Defendants”) Administrative Motion to File Confidential Documents Under Seal (Dkt. No. 889).
2. I have been employed at Chunghwa since 1998. I am presently responsible for sales of TFT-LCD panels for use in computer monitors and notebook computers.

3. During the period 1998 through 2004, I held various positions relating to LCD panel sales and projector sales.

4. I have reviewed the following documents attached to the Declaration of Jeffrey Kessler in Support for Defendants' Motion for Sanctions Pursuant to Rule 11 ("Kessler Declaration") (Dkt. No. 889):

- Direct Purchaser Plaintiffs' Supplemental Responses to Defendant MT Picture Display Co., Ltd.'s First Set of Interrogatories, attached thereto as Exhibit A.
- Direct Purchaser Plaintiffs' Supplemental Responses to LG Electronics, Inc.'s First Set of Interrogatories, attached thereto as Exhibit C.
- Indirect Purchaser Plaintiffs' Supplemental Responses and Objections to Defendant Samsung Electronics America, Inc.'s First Set of Interrogatories to the Indirect Purchaser Plaintiffs, attached thereto as Exhibit E.
- Indirect Purchaser Plaintiffs' Supplemental Responses and Objections to Defendant Samsung SDI America, Inc.'s First Set of Interrogatories to the Indirect Purchaser Plaintiffs, attached thereto as Exhibit F.
- Chunghwa document CHU00029238-40, report and analysis of meeting of April 14, 1999, as well as Chunghwa's English translation, attached thereto as Exhibit G;
- Chunghwa document CHU00030787-94, report and analysis of meeting of June 23, 1999, as well as Chunghwa's English translation, attached thereto as Exhibit H;
- Chunghwa document CHU00028933-45, report and analysis of meeting of May 29, 1995, as well as Chunghwa's English translation, attached thereto as Exhibit I;
- Chunghwa document CHU00028909-11, report and analysis of meeting of October 24, 1996, as well as Chunghwa's English translation, attached thereto as Exhibit J;
- Chunghwa document CHU00028749-51, report and analysis of meeting of March 19, 1997, as well as Chunghwa's English translation, attached thereto as Exhibit K;
- Chunghwa document CHU00031013-14, report and analysis of meeting of June 28, 2000, as well as Chunghwa's English translation, attached thereto as Exhibit L;

- Chunghwa document CHU00031051-55, report and analysis of meeting of September 21, 2000, as well as Chunghwa's English translation, attached thereto as Exhibit M;
- Chunghwa document CHU00031183-85, report and analysis of meeting of February 22, 2002, as well as Chunghwa's English translation, attached thereto as Exhibit N;
- Chunghwa document CHU00031240-47, report and analysis of meeting of March 25-27, as well as Chunghwa's English translation, attached thereto as Exhibit O;
- Chunghwa document CHU00031254, report and analysis of meeting of July 2, 2004, as well as Chunghwa's English translation, attached thereto as Exhibit P.

5. Exhibits A, C, E, and F of the Kessler Declaration contain excerpts and detailed, substantive summaries of internal reports prepared by Chunghwa employees for review and analysis by Chunghwa supervisors. Excerpts and detailed summaries of Chunghwa internal reports appear at the following locations, listed by page and line number:

- Exhibit A: 41:17-24; 42:2-21; 43:1-22, 24-26; 44:1-15, 17-21, 23-28; 45:1-3, 5-20, 23-25; 46:1-3, 8-9, 11-13, 25-28; 47:1-8, 15-22, 24-28; 48:1-5, 8-11, 14-24, 25-28; 49:1-3, 5-10, 12-14, 17-28; 50:1-5, 9-11, 15-16, 18-23; 51:2-5, 7-9.
- Exhibit C: 41:20-16; 42:2-21; 43:1-22, 24-26; 44:1-15, 17-21, 23-27; 45:1-3, 5-17, 21-23; 46:1-3, 8-9, 11-13, 20-23, 26-27; 47:1-10, 18-25; 48:1-10, 14-17, 20-28; 49:1-3, 4-18, 20-22, 25-27; 50:1-13, 17-20, 23-25, 26-27; 51:1-3, 10-14, 16-17.
- Exhibit E: 8:8-16, 18-26; 9:3-6, 8-14, 16-18, 20-26; 10:1-12, 16-19, 22-24, 25-27; 11:1-2, 9-12, 16-18, 21-24; 12:1-6, 9-12, 14-22, 24-27; 13:1-2, 4-8; 14: 4-7, 11-15, 20-23; 16:16-21; 18:4-7; 22:12-20, 22-28; 23:1-3, 6-9, 11-16, 18-20, 22-27; 24:1-14, 18-21, 25-27; 25:1-6, 13-15, 19-21, 24-27; 26:3-9, 12-15, 17-24, 27-28; 27:1-4; 7-11.
- Exhibit F: 8:3-11, 13-22, 26-28; 9:1, 3-10, 12-14, 16-27; 10:1-7, 11-14, 18-20, 21-25; 11:5-8, 12-14, 18-21, 26-28; 12:1-4, 8-11, 14-21, 24-28; 13:1, 4-8; 14:5-8, 12-16, 21-24; 16:17-22; 18:4-7; 21:25-28; 22:1-6, 7-16, 20-22, 24-28; 23:1-3, 5-7, 9-27; 24: 4-7, 11-13, 14-19, 26-27; 25:1-2, 5-7, 17-22, 26-27; 26:1-2, 4-12, 14-19, 21-25.

6. Exhibits G through P of the Kessler Declaration are full copies of internal reports prepared by Chunghwa employees for review and analysis by Chunghwa supervisors.

